

FILED

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CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
TOLEDO

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

KATHREN BALDRIDGE,
DEVIN COLLINS,

Defendants.

) INDICTMENT
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CASE NO.

Title 18, United States Code,
Sections 371, 922(a)(6),
922(d)(1), 922(n), and
924(a)(1)(D) and (a)(2)

MAG JUDGE CLAY

3:22 CR 159

JUDGE ZOUHARY

GENERAL ALLEGATIONS

At all times relevant to this Indictment:

1. Towers Armory, located at 1469 Towers Rd, Oregon, OH 43616, was a Federal Firearms Licensee.
2. DEVIN COLLINS was under Indictment for a crime punishable by imprisonment for more than one year, that being, Improperly Transporting a Firearm in a Motor Vehicle and Having Weapons While Under Disability, in Case Number CR-202101660, Lucas County Common Pleas Court.

COUNT 1

(Conspiracy, 18 U.S.C. § 371)

The Grand Jury charges:

3. The allegations contained in paragraphs 1 and 2 of the Indictment are realleged and incorporated by reference as if fully set forth herein.

ORIGINAL

4. Beginning on or about August 5, 2021, and continuing until on or about August 6, 2021, in the Northern District of Ohio, Western Division, Defendant KATHREN BALDRIDGE and DEVIN COLLINS did combine, conspire, confederate, and agree, with one another, to commit offenses against the United States, to wit:

- a. To knowingly make a false and fictitious written statement, which was intended to deceive a firearms dealer, as to a fact material to the lawfulness of such sale of said firearm to Defendant under Chapter 44 of Title 18, in violation of Title 18, United States Code, Section 922(a)(6);
- b. To knowingly dispose of a firearm to a person she knew or had reasonable cause to believe was under indictment for a crime punishable by imprisonment for more than one year in violation of Title 18, United States Code, Section 922(d)(1); and
- c. To knowingly receive a firearm while under indictment for a crime punishable by imprisonment exceeding one year in violation of Title 18, United States Code, Section 922(n).

OBJECT OF THE CONSPIRACY

5. The object of this conspiracy was for BALDRIDGE to obtain a firearm for COLLINS who was legally prohibited from possessing a firearm.

MANNER AND MEANS OF THE CONSPIRACY

6. It was part of the conspiracy that:
 - a. BALDRIDGE agreed to obtain one or more firearms from a Federal Firearms Licensee for COLLINS.
 - b. BALDRIDGE obtained one or more firearms from a Federal Firearms Licensee for COLLINS.

c. BALDRIDGE gave one or more of the firearms purchased from the Federal Firearms Licensee to COLLINS knowing or having reasonable cause to believe that COLLINS was under indictment for a crime punishable by imprisonment exceeding one year.

d. COLLINS received a firearm knowing he was under indictment for a crime punishable by imprisonment exceeding one year.

ACTS IN FURTHERANCE OF THE CONSPIRACY

7. In furtherance of the conspiracy, and to affect the objects and conceal the existence thereof, BALDRIDGE AND COLLINS performed acts in the Northern District of Ohio, including but not limited to, the following:

8. On or about August 5, 2021, BALDRIDGE and COLLINS traveled to Towers Armory, located at 1469 Towers Rd, Oregon, OH 43616.

9. On or about August 5, 2021, BALDRIDGE, in the presence of COLLINS, attempted to purchase a firearm, a Hi-Point, 9mm pistol, serial number P10135610, from Towers Armory, located at 1469 Towers Rd, Oregon, OH 43616.

10. On or about August 5, 2021, BALDRIDGE, in the presence of COLLINS, filled out ATF form 4473 and falsely indicated she was the actual purchaser or transferee of the firearm. BALDRIDGE'S purchase was delayed in order to complete BALDRIDGE'S background check. BALDRIDGE and COLLINS left Towers Armory.

11. On or about August 6, 2021, BALDRIDGE and COLLINS returned to Towers Armory.

12. On or about August 6, 2021, BALDRIDGE, in the presence of COLLINS, completed the purchase of the Hi-Point, 9mm pistol, serial number P10135610.

13. On or about August 6, 2021, BALDRIDGE, just after exiting Towers Armory, gave the Hi-Point, 9mm pistol, serial number P10135610, to COLLINS.

14. On or about August 6, 2021, COLLINS, just after exiting Towers Armory, took possession of the Hi-Point, 9mm pistol, serial number P10135610, from BALDRIDGE and concealed it in his pants.

All in violation of Title 18, United States Code, Section 371.

COUNT 2

(False Statement in Connection with the Purchase of a Firearm, 18 U.S.C. §§ 922(a)(6) and 924(a)(2))

The Grand Jury further charges:

15. On or about August 5, 2021, in the Northern District of Ohio, Western Division, Defendant KATHREN BALDRIDGE, in connection with the acquisition of a firearm, to wit: a Hi-Point, 9mm pistol, serial number P10135610, from Towers Armory, located at 1469 Towers Rd, Oregon, OH 43616, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement, which was intended to deceive the firearms dealer, as to a fact material to the lawfulness of such sale of said firearm to Defendant under Chapter 44 of Title 18, in that she did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives form 4473, Firearms Transaction Record, to the effect that she was the actual buyer/transferee, knowing the statement was false, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 3

(Disposing of a Firearm to a Person Under Indictment for a Felony, 18 U.S.C. §§ 922(d)(1) and 924(a)(2))

The Grand Jury further charges:

16. On or about August 6, 2021, in the Northern District of Ohio, Western Division, Defendant KATHREN BALDRIDGE, knowingly disposed of a firearm, to wit: a Hi-Point, 9mm pistol, serial number P10135610, to a person she knew or had reasonable cause to believe was under indictment for a crime punishable by imprisonment for a term exceeding one year, that being DEVIN COLLINS, said firearm having been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(d)(1) and 924(a)(2).

COUNT 4

(Receipt of a Firearm While Under Indictment, 18 U.S.C. §§ 922(n) and 924(a)(1)(D))

The Grand Jury further charges:

17. On or about August 6, 2021, in the Northern District of Ohio, Western Division, Defendant DEVIN COLLINS, knowing he was under indictment for crimes punishable by imprisonment exceeding one year, those being: Improperly Transporting a Firearm in a Motor Vehicle and Having Weapons While Under Disability, on or about May 10, 2021, in Case Number CR-202101660, Lucas County Common Pleas Court, knowingly received a firearm, to wit: a Hi-Point, 9mm pistol, serial number P10135610, said firearm having been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(n) and 924(a)(2).

FORFEITURE

The Grand Jury further charges:

18. For the purpose of alleging forfeiture pursuant to Title 18, United States Code Section 924(d)(1), and Title 28, United States Code, Section 2461(c), the allegations of Counts 2

through 4 are incorporated herein by reference. As a result of the foregoing offenses, Defendant Defendants KATHREN BALDRIDGE and DEVIN COLLINS shall forfeit to the United States any and all firearms and ammunition involved in or used in the commission of the violations charged in Counts 2 through 4; including, but not limited to, the following: a Hi-Point, 9mm pistol, serial number P10135610, seized on August 6, 2021.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.